

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GOOGLE LLC,

Plaintiff,

Civil Action No.: 1:21-cv-10260-DLC

- against -

**NOTICE OF MOTION**

DMITRY STAROVIKOV;  
ALEXANDER FILIPPOV;  
and Does 1-15,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants DMITRY STAROVIKOV and ALEXANDER FILIPPOV's motion for an order vacating the entry of default under Fed. R. Civ. P. 55(c) and dismissing the action for lack of personal jurisdiction, failure to state a claim, and on forum non-convenience grounds, with Exhibits, Declarations of DMITRY STAROVIKOV and ALEXANDER FILIPPOV, and upon all prior proceedings, pleadings, and filings in this Action, Defendants will move this Court at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be designated by the Court, for an Order pursuant to Fed. R. Civ. P. 55(c) vacating the entry of default and dismissing the action against Defendants, and awarding Defendants such other and further relief as the Court deems just and proper.

Dated: March 14, 2022  
Brooklyn, NY

/s/ Igor Litvak, Esq.

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